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March 16, 2001

US Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, IL 60604

**In the Matter of: The Chemical Recovery Systems (CRS) Site, Elyria, Ohio
Section 107(a) of CERCLA Response &
Section 104(e) of CERCLA Response for:**

**Republic Steel
Republic Technologies International
3770 Embassy Parkway
Akron, OH 44333-8367**

Dear Ms. Sheppard-Johnson:

Republic Technologies International received U.S. EPA's General Notice of Potential Liability and Request for Information (dated March 2, 2001) regarding the above-referenced site on March 8, 2001. The General Notice/Information Request is directed to Republic Steel, Republic Technologies International, 3770 Embassy Parkway, Akron, Ohio. This letter serves as Republic Technologies International's timely response to both the General Notice and the Information Request contained in U.S. EPA's March 2, 2001 letter. Please be advised that I left voice mail messages with you earlier this week to discuss the situation.

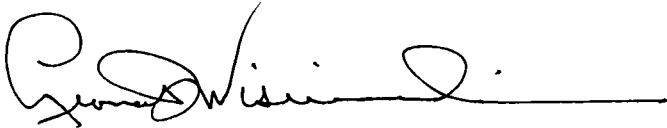
Republic Technologies International was formed on August 13, 1999, and is not the responsible owner/operator for the entity "Republic Steel" shown as No. 103 on the CRS Site PRP listing attached to U.S. EPA's March 2, 2001 letter as Attachment 8. The Republic Technologies International formation involved Republic Engineered Steels, Inc., which was incorporated on November 28, 1989 as an "Employee Owned" organization (ESOP). Republic Engineered Steels was the former Bar Division of LTV Steel Co., and did not assume any liabilities associated with pre-1989 off-site disposal practices upon its formation. Nor was Republic Engineered Steels the legal successor to LTV Steel, which continued to exist after the 1989 transaction and still exists today. According to the Site History included with U.S. EPA's March 2, 2001 letter (Attachment 1), all of the activities at the CRS Site occurred well before 1989 (ending no later than 1981). Thus, during the period of time in question, neither Republic Technologies International nor Republic Engineered Steels existed. In order to identify "Republic Steel" from the time period in question, you probably would have to go further back to the formation of LTV Steel Co. in 1984. As I understood that transaction, Jones & Laughlin Steel Co. and Republic Steel Corporation were merged into LTV Steel Co.

2633 Eighth Street NE, Canton, Ohio 44704
330.438.5416 Voice, 330.438.5492 Fax
lwisniewski@republictech.com

Ms. Deena Sheppard-Johnson
March 16, 2001

For the reasons set forth above, Republic Technologies International is not a potentially liable party at the CRS Site and no further response to U.S. EPA's General Notice or Information Request is required. It appears that U.S. EPA mistakenly assumed that "Republic Steel" and Republic Technologies International are the same corporate entity. They are not, and Republic Technologies International respectfully asks U.S. EPA to remove its name from the PRP List developed for the CRS Site so that any further confusion is avoided. We trust that you will quickly concur that this is a case of mistaken identity. If U.S. EPA requires any further information to clarify the matter, please contact me at 330.438.5416.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard D. Wisniewski", followed by a horizontal line.

Leonard D. Wisniewski
Director, Environmental Affairs
Republic Technologies International, LLC

Cc:

Wendlene M. Lavey, Esq.
Squire Sanders
Cleveland, Ohio

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